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Attorney for DANIEL WOOLEM

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF WASHINGTON

UNITED STATES OF AMERICA,	)	
	)	NO. 1:16-cr-02079-SAB-1
Plaintiff,	)	
	)	MOTION AND
vs.	)	DECLARATION TO
	)	CONTINUE TRIAL DATE
DANIEL WOOLEM,	)	
	)	June 8, 2017, 6:30 p.m.
	)	(w/o oral argument)
Defendant.	)	

COMES NOW the Defendant, DANIEL WOOLEM, by and through his attorney of record, Ricardo Hernandez, and moves this court for an order continuing the Trial date set for June 26, 2017 at 8:30am.

This motion is based upon the court file in the instant case, and the accompanying declaration of counsel.

DATED this 8<sup>th</sup> day of June 2017.

s/ Ricardo Hernandez  
Ricardo Hernandez

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4 RICARDO HERNANDEZ, being first duly sworn upon oath, deposes and

5 States as follows:

- 6  
7 1. I am the attorney of record for the defendant Daniel Woolem  
in the above matter.  
8  
9 2. The trial is currently scheduled for June 26, 2017 at 8:30am.  
10  
11 3. Defense counsel is requesting a continuance due to personal circumstances  
that have affected his ability to adequately prepare for trial.  
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13 4. My oldest brother Jose Hernandez is in the hospital in Intensive Care due to  
complications of late stage Cirrhosis of the liver.  
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15 5. For this reason I am trying to spend as much time with my brother and his  
family if he doesn't survive.  
16  
17 6. Within the last six months both my sister Bea Weddle-Hernandez and my  
brother Bob Hernandez passed away after a battle with cancer.  
18  
19 7. The Government has no objection to the continuance of the Trial date and  
20 has agreed to a trial date of August 28, 2017  
21  
22 8. Mr. Woolem does not object to my request for a continuance of the Trial  
Date and will sign a Speedy Trial Waiver to August 28, 2017.  
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24 9. For the reasons stated, defense counsel would request a continuance of  
the current Trial date.  
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4 I hereby certify under penalty of perjury under the laws of the State of Washington  
5 that the foregoing is true and correct to the best of my knowledge.

6 Dated this 8<sup>th</sup> day of June 2017  
7

8  
9 s/ Ricardo Hernandez  
10 Ricardo Hernandez

11 I hereby certify that on June 8, 2017 I electronically filed the foregoing with the  
12 Clerk of the Court using the CM/ECF System which will send notification of such  
13 filing to the following: Thomas J. Hanlon, Assistant U.S. Attorney  
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15  
16 s/ Ricardo Hernandez  
17 Ricardo Hernandez  
18 Washington State bar #21463  
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